

EXHIBIT B

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Sent: Tuesday, October 6, 2020 4:21 PM

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Subject: RE: Valsartan- Class Representative Discovery


Counsel:

So that you can prepare accordingly, on tomorrow's meet-and-confer regarding the document requests directed at the consumer and TPP class representatives, we would like to discuss the following questions:

1. Have you produced all documents that you believe support class certification under Rule 23? Were all such documents produced in response to the Plaintiff Fact Sheets ("PFSs")?
2. Do you anticipate relying on preferred drug lists/formularies and/or co-pay information in moving for class certification? Have you obtained and reviewed any formularies, summary plan descriptions, plan documents, or group insurance policies applicable to any consumer class or TPP class representative? If so, when can these documents be produced?
3. Do you anticipate relying on drug replacement information in moving for class certification? Do you have any documents relating to replacement drugs that can be produced?
4. So that we may focus our discovery, how do you contend damages should be calculated for the causes of action in the economic loss action?

5. Have you produced all documents MSP has received from its Assignors?
6. Is MSP going to rely on the claims of its Assignors for purposes of satisfying Rule 23's certification requirements or at trial?
7. Are any consumer class representatives claiming that their VCDs were ineffective or less effective as a result of the presence of nitrosamines? If so, what documents do they intend to rely upon on that point, and when can those documents be produced?
8. Have you produced all documents that you believe identify unnamed class members of the consumer and TPP classes? Will you be providing identifying information for unnamed class members outside of subscriber IDs?

Seth



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